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***Master Leasing Plans***

In the Bighorn Basin, three areas were nominated for Master Leasing Plan (MLP) review – a concept introduced by the BLM in its Oil and Gas Leasing Reform Instructional Memorandum (IM) 2010-117. These included the Absaroka-Beartooth Front, Fifteen Mile, and the Big Horn Front. The BLM determined that none of the nominated areas met the criteria for requiring MLP analysis. However the BLM did identify resources of concern within these areas. Review of BLM Wyoming Oil and Gas Leasing Reform Master Leasing Plans Statewide MLP Evaluation (p. 4) shows:

**CATEGORY 2 --** These six geographic areas (figure 3) all failed the initial GIS screen of criteria 1 through 3. However, each of the proposed MLPs are in areas where existing management prescriptions related to oil and gas leasing are addressed in older RMPs currently under revision. The BLM Wyoming State Director is exercising the discretion allowed in IM 2010-117 to evaluate alternatives for these geographic areas along with other relevant data during the preparation of an ongoing LUP revision. BLM will evaluate oil and gas leasing decisions for these areas that address resources of concern and better fit the MLP criteria.

I agree that the proposed MLP analysis areas in the Planning Area do not meet the MLP criteria. Further, the Wyoming Game and Fish Department (WGFD) has evaluated the proposed wildlife stipulations associated with the MLP analysis areas identified in the Bighorn Basin. WGFD concurs if those stipulations remain in effect additional leasing constraints through an MLP are unnecessary. I request that the BLM not further pursue MLPs in the Bighorn Basin and the BLM keep the proposed stipulations as outlined.

***Lands with Wilderness Characteristics***

There are currently 12 Wilderness Study Areas in the Bighorn Basin. Additional management for wilderness attributes would have a significant impact on mineral development, ranchers, recreationalists and others who rely on the lands for many different reasons in the Bighorn Basin. I support the BLM's decision not to manage for wilderness characteristics. In concert with local cooperators, I am however, concerned with the potential for future conflict because of the incorrect inventory maintained by the BLM. As you are aware, local cooperators have presented information that the inventory and analysis is flawed. The BLM, in conjunction with local cooperators and the general public, should initiate a new inventory process and, where justified, correct misclassifications of lands with wilderness characteristics.

***Travel Management***

Additional access to public lands for recreational and off highway vehicle use is an important guiding principle. Given the large swaths of federal lands in Wyoming, access is precious. I am convinced that when people are afforded the opportunity to enjoy our open spaces they are also

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inspired to protect the land. This does not happen when access to BLM lands is restricted or closed.

It is my understanding that the BLM intends to undertake a comprehensive review of travel management in the Bighorn Basin following the Record of Decision (ROD). The BLM should not seek to restrict or close access to public lands through this RMP Revision. The public process to review travel management must be complete and robust.

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Chapter 2	2-8	<i>"In instances where varying levels of management prescriptions overlap a single polygon, the stricter of the management prescriptions would apply."</i> Management prescriptions should be based upon the condition of the site, management objectives and desired conditions not on the strictness of the action or prescription.	Replace with: "In instances where varying levels of management prescriptions overlap a single polygon, the management action that is most likely to move the site towards objectives should be used."
Record #0002	2-15 and 2-85	Management Action Common To All: <i>"The BLM may pursue a withdrawal from appropriation under the mining laws for locatable minerals within ACECs, recommended WSR suitable waterway segments, and special status species habitat on a case-by-case basis."</i> Record # 0002 is broad in its potential application.	I request that the following language be added to Record # 0002: "...on a case-by-case basis and only when potential impacts cannot be mitigated."
Table 2.4	2-16	Goal MR:2.3 provides: "Priority will be given to leasing and development of fluid mineral resources, including geothermal, outside of PHMA and GHMA. When analyzing leasing and authorizing development of fluid mineral resources, including geothermal, in PHMA and GHMA, and subject to applicable stipulations for the conservation of greater sage-grouse, priority will be given to development in non-habitat areas first and then in the least suitable habitat for greater sage-grouse. The implementation of these priorities will be subject to valid existing rights and any applicable law or regulation, including, but not limited to, 30 U.S.C. 226(p) and 43 C.F.R. 3162.3-1(h)."	This priority has been represented to the State as applying only within PHMA. Regardless, Goal MR:2.3 should be deleted.
Record #2029	2-18 and 2-106	Record #2029 precludes new development in the Oregon Basin Oil Field in excess of current disturbance levels. The Oregon Basin Oil Field was first developed in 1912.	The following language from the second paragraph should be deleted: "except in the Oregon Basin Oil Field, where new

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		<p>It meets the definition of an oil and gas management area and development should continue.</p> <p>Existing Language: “Postpone or modify projects that may affect special status species to protect these species.</p>	<p>development will not exceed the current disturbance levels.”</p> <p>“Affect” requires a qualifier; as written, projects may be postponed or modified regardless of positive or negative impact. I recommend adding the word “negatively” before “affect”. In regard to the second sentence referring to the USFWS, BLM does not need to consult with USFWS for a number of species, including sage-grouse. Change this sentence to read: “Consult with USFWS in such cases, in accordance with the Endangered Species Act.””</p>
Record #4085	2-21		
Record #4100	2-22	<p>Existing language: “Treat constructed or non-natural water storage impoundments...on a priority basis.”</p>	<p>As written, this is a requirement. I do not disagree with the intent of Record # 4100, but do not believe it should be required. Change “on a priority basis” to read “as necessary” in order to maintain flexibility and avoid any confusion on what is “priority” and what is not.</p>
Record #4102	2-22	<p>Existing Language: “In cooperation with stakeholders, design and locate fences so as not to disturb important greater sage-grouse habitat areas. Increase the visibility of existing fences in these areas to reduce hazards to flying greater sage-grouse.”</p>	<p>Change “important greater sage-grouse habitat areas” to “PHMAs.” Modify the second sentence to read: “Increase the visibility of identified hazard fences in PHMAs.”</p>
Record #4117	2-23 and 2-151	<p>Record #4117 establishes that “[l]eases should be a minimum of 640 contiguous acres of federal mineral</p>	<p>Paragraph three and four of Record #4117 are unnecessary in light of Record #4120</p>

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	through 2-152	estate."	(pp. G-21 through G-22) and should be deleted.
Record #4117	2-23		The language is unnecessary and is inconsistent with EO 2015-4 and should be deleted.
Record #4121	2-24 and 2-157 through 2-158	Adjust language regarding noise to achieve consistency with EO 2015-4.	I request this language be changed to achieve consistency with EO 2015-4 - "New project noise levels, either individual or cumulative, should not exceed 10 decibels (as measured by L50) above baseline noise at the perimeter of the lek from 6:00 pm to 8:00 am during the breeding season (March 1-May 15). Specific noise protocols for measurement and implementation will be developed as additional research and information emerges."
Record #4122	2-24		EO 2015-4 provides (see Attachment B): "Locate new collector or arterial roads that will have relatively high levels of activity (accessing multiple wells, housing development) greater than 1.9 miles from the perimeter of occupied Greater sage-grouse leks (Lyons and Anderson 2003). Locate new local roads used to provide facility site access and maintenance greater than 0.6 miles from the perimeter of occupied Greater sage-grouse leks. Construct roads to minimum design standards needed for production activities." In EO 2015-4, collector or arterial roads are defined as: "single-lane or double-lane roads, with travel

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		<p>ways 12 to 24 feet in width. They collect traffic from local roads and connect to arterial roads or public highways. They are operated for intermittent or constant service." Local roads are defined as: "single-lane roads with travel ways 12 to 14 feet in width. They connect terminal facilities, such as well sites, to collector, local, arterial, or other higher-class roads. They are operated for low-volume traffic."</p>
Record #6017	2-25 (and globally)	<p>The MA establishes that disposal of lands must "provide a net conservation gain to the Greater Sage-Grouse..." Wyoming strategy is mitigation. If a project conforms to the management prescriptions contained in EO 2015-4, no additional mitigation is required."</p>
Record # 6061	2-26	<p>BLM states that "do not construct new recreation facilities (e.g., campgrounds, trails, trailheads, staging areas) unless the development would have a net conservation gain to Greater Sage-Grouse habitat" Wyoming strategy is mitigation. If a project conforms to the management prescriptions contained in EO 2015-4, no additional mitigation is required."</p>
Record #7179	2-27	<p>To rectify this inconsistency, the BLM should add the following language: "in PHMAs that exceed the threshold of 5% disturbance and an average of 1 activity per 640 acres, the BLM will require and ensure mitigation that provides a net conservation gain to the species."</p> <p>To rectify this inconsistency, the BLM should add the following language: "in PHMAs that exceed the threshold of 5% disturbance and an average of 1 activity per 640 acres, the BLM will require and ensure mitigation that provides a net conservation gain to the species."</p> <p>To be consistent with EO 2015-4, I request the following modification to Record # 7179: "...implement mitigation and minimization guidelines and required design features, including specific measures for Greater sage-grouse (Refer to</p>

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2.3.6 Regional Mitigation for Greater Sage-Grouse Habitat Management	2-31 through 2-32	BLM states that "the intent of the Proposed Plan is to provide a net conservation gain to the species." Wyoming strategy is mitigation. If a project conforms to the management prescriptions contained in EO 2015-4, no additional mitigation is required."	To rectify this inconsistency, the BLM should add the following language: "in PHMAs that exceed the threshold of 5% disturbance and an average of 1 activity per 640 acres, the BLM will require and ensure mitigation that provides a net conservation gain to the species."
Table 2.5	2-38	Footnote 1 for each of these tables provides: " <i>Seasonal dates can be adjusted by local unit according to geographic region.</i> " This is inconsistent with EO 2015-4 and within the amendment document.	EO 2015-4 provides: "Where credible data support different timeframes for these seasonal restrictions, dates may be shifted 14 days prior to or subsequent to the above dates, but not both." This language should be adopted in Table 2.5.
Table 2.9	2-100	Goal MR:2.3 provides: "Priority will be given to leasing and development of fluid mineral resources, including geothermal, outside of PHMA and GHMA. When analyzing leasing and authorizing development of fluid mineral resources, including geothermal, in PHMA and GHMA, and subject to applicable stipulations for the conservation of greater sage-grouse, priority will be given to development in non-habitat areas first and then in the least suitable habitat for greater sage-grouse. The implementation of these priorities will be subject to valid existing rights and any applicable law or regulation, including, but not limited to, 30 U.S.C. 226(p) and 43 C.F.R. 3162.3-1(h)."	This priority has been represented to the state as applying only within PHMA. Regardless, Goal MR:2.3 should be deleted.

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Record #2035	2-109	BLM needs to recognize that at some point in time EOR projects may qualify as sequestration projects for myriad federal and state laws and regulations. In fact, many now agree that the only currently-economic mechanism for geologic sequestration of CO2 is EOR. Record #2035 would allow sequestration only where it "does not detract" from other resource objectives. BLM needs to consider the link between EOR and sequestration when evaluating the feasibility of these alternatives.
New language in appendix or Ch. 1	2-123	Need to address state laws related to aquatic invasive species.
	2-137	Need to maintain and protect critical fish spawning, egg incubation, and fry areas, including applying timing limitations to surface-disturbing activities within water channels that will adversely affect spawning, egg incubation, and fry areas in fish bearing streams. Spring spawning is protected March 15 to July 31 and fall spawning is protected September 15 to November 30. Dates may vary by species and location.
Record #4079	2-144	I am strongly opposed to the BLM's proposal to "[a]pply <i>wildlife seasonal protections for surface-disturbing and disruptive activities to maintenance and operation (including production) of projects[.]</i> " This not only poses a potential safety risk, it could cause year-round operations to cease, which could have a significant impact on revenue streams. Further, it is inconsistent with EO 2015-4. Finally, Appendix H, as noted in Record \$4079,

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Record #4080	2-144	makes no mention of detrimental activities.  "Address traditional migration ..." Need better language than "address"	Change "address" to "protect and identify" or "preserve and identify" (similar to language used in Alt B.)
Record #4121	2-157	Existing language: " <i>Noise levels at the perimeter of the lek should not exceed 10 dBA above ambient noise. The BLM would work with proponents to limit project-related noise where it would be expected to reduce functionality of habitats that support PHMA area populations.</i> "	I request this language be changed to achieve consistency with EO 2015-4 - "New project noise levels, either individual or cumulative, should not exceed 10 decibels (as measured by L50) above baseline noise at the perimeter of the lek from 6:00 pm to 8:00 am during the breeding season (March 1-May 15). Specific noise protocols for measurement and implementation will be developed as additional research and information emerges."
Record #4125	2-161	Record #4125 provides: "If the USFWS and WGFD determine that large prairie dog colonies and/or complexes within the Planning Area are suitable for black-footed ferret reintroduction, apply a NSO restriction on these areas."	I request that you select Alternative A, the No Action Alternative.
Record #6025	2-184		In order to achieve consistency between all plans, please include the following language: "Within PHMAs, all RMPs are amended as follows: Wind energy development would be avoided in PHMAs, and not allowed unless it can be sufficiently demonstrated that the

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			development activity would not result in declines of PHMA populations. Sufficient demonstration of “no declines” should be coordinated with the WGFD and USFWS.” Insert appropriate map.
Record #7244	2-321 through 2.322	Record # 4244 applies “a minimum lease size of 640 contiguous acres of federal mineral estate...”	Paragraph two, three and four of Record # 7244 are unnecessary in light of Record # 4120 (pp. G-21 through G-22) and should be deleted.
Chapter 2	2-329	<i>“If an effective grazing system that meets sage-grouse habitat requirements is not already in place, analyze at least one alternative that conserves, restores, or enhances sage-grouse habitat in the NEPA document prepared for permit renewal.”</i>	Replace with: “If a grazing system that recognizes the sage-grouse habitat objectives (Table 2-2) is not already in place, analyze at least one alternative in the NEPA document that enhances grazing management and desired conditions for sage-grouse conservation.”
Record #7275	2-333	<i>“Evaluate the role of existing seedings to determine if the area should be restored to sagebrush or habitat of higher quality for sage-grouse. If these seedings are part of an AMP/Conservation Plan or if they provide value in conserving or enhancing the rest of the greater sage-grouse PHMAs, then no restoration would be necessary. Assess the compatibility of these seedings for sage-grouse habitat or as a component of a grazing system during the rangeland health assessments (or other analyses [USFS only]).”</i>	Remove USFS from action and use the language from the Buffalo RMP Revision: “Evaluate the role of existing seedings that are currently composed of primarily introduced perennial grasses in and adjacent to sage-grouse habitat to determine if they should be restored to sagebrush or habitat of higher quality for sage-grouse. If these seedings provide value in conserving or enhancing sage-grouse habitats, then no restoration would be necessary. Assess the compatibility of

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Game Birds (Greater Sage-Grouse)	3-128	<p>The document notes: "Preliminary winter concentration areas have been mapped by WGFDF and BLM personnel and will be further refined and delineated as more data are collected (Easterly 2012). There are currently 210,229 acres of greater sage-grouse winter concentration areas mapped in the Planning Area, which are located predominately within PHMAs." This mapping does not conform to standards established in EO 2015-4 (see Attachment A) and further the areas identified are not recognized by the State of Wyoming as winter concentration areas.</p>	<p>these seedings for sage-grouse habitat during the land health assessments."</p> <p>This notation and the associated map (Map 42) should be removed from the document.</p>
1.0 Required Design Features	L-12	<p>The BLM indicates that it will "[r]equire unitization when deemed necessary for proper development of an area..." Use of unitization in this manner misinterprets the legal purpose of unitization as established by law and BLM guidance. Unitization provides for the exploration and development of an entire geologic structure or area by a single operator so that drilling and production may proceed in the most efficient and economic manner, not for the protection of resources. Further, 43 CFR § 3186.1 9. DRILLING AND DISCOVERY. provides: "Within 6 months after the effective date hereof, the Unit Operator shall commence to drill and adequate test well at a location approved by the AO..." and "wells shall be drilled with not more than 6-months time elapsing between the completion of the first well and commencement of drilling</p>	<p>This RDF should be deleted as it has the potential to require development contrary to the conservation goals outlined in EO 2015-4.</p>

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		operations for the second well..."	Revise for consistency with the 9 Plan definition: "Core Habitat: Sage-grouse core habitat (as defined in the WY EO 2015-4) is one of two components of Sage-grouse Priority Habitat Management Areas. Core habitats are state-designated areas identified as the most important for Greater Sage-Grouse and include breeding, late brood-rearing, winter concentration areas. It does not include known, migration or connectivity corridors. Sage-grouse core habitat plus connectivity habitat together make up Sage-grouse Priority Habitat Management Areas."
Glossary	8	<i>Core areas - With its vague reference to an undated study from Riverside County, CA, the definition of core area in the BHB RMP (Glossary-8), is not consistent with the 9 Plan.</i>	
Glossary	2	<i>"When identifying Category I allotments, review condition of critical habitat, conflicts with sage-grouse, and whether projects have been proposed specifically for implementing the Healthy Lands Initiative (BLM 2008a)."</i>	"Condition of critical habitat" is not consistent with the Healthy Lands Initiative
Glossary	41	<i>Unoccupied lek - The BHB RMP contains this definition: "There are two types of unoccupied leks, 'destroyed' and 'abandoned.' Unoccupied leks are not protected during surface disturbing activities." But because the BHB RMP lacks a definition of "abandoned," a lek which has been abandoned for one year could conceivably be considered unoccupied and thus vulnerable to disturbance.</i>	The 9 Plan contains the proper definition: <i>Abandoned Lek: A lek in otherwise suitable habitat that has not been active during a period of 10 consecutive years.</i> To be designated abandoned, a lek must be "inactive" in at least four non-consecutive strutting seasons spanning the 10 years.

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		The site of an “abandoned” lek should be surveyed at least once every 10 years to determine whether it has been re-occupied by sage-grouse.	
		<i>Unnecessary or Undue Degradation</i> - Given its legal significance and implications, the term “unnecessary or undue degradation” should be defined.	The definition should include the regulatory definition (43 CFR 3809.5) and also a description of activities or effects that result from or could be caused by the implementation of the RMP that would constitute Unnecessary or Undue Degradation, such as exceedances of the density/disturbance limits in Priority Habitat Management Areas. The definition should include a statement that the Secretary of the Interior has an affirmative responsibility under Section 302(b) of FLPMA to prevent unnecessary or undue degradation of the public lands.
Glossary			<p><i>Winter Concentration Area</i> - The term "Winter Concentration Area" is not defined in the BHB Plan. It is, however, defined in the 9 Plan (GL-44) as follows:</p> <p><i>"Winter Concentration Areas: Sage-grouse winter habitats which are occupied annually by sage-grouse and provide sufficient sagebrush cover and food to support birds throughout the entire winter (especially periods with above average snow cover). Many of these areas support several different breeding populations of sage-grouse. Sage-grouse typically show high fidelity for these areas,</i></p>

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Appendix B: Laws, Regulations, Policies, and Guidance	B-11	<i>and loss or fragmentation can result in significant population impacts.</i>  Need to include SEO/BLM MOU in the list of Memoranda and Agreements in Table B-4. The 2012 MOU specifies roles, responsibilities and procedures for water rights permitting and water use on or derived from BLM lands in Wyoming.  This MA Stipulation is inconsistent with EO 2015-4.	Recommend adding the following language to Table B-4: "MOU Between the State of Wyoming State Engineer's Office and the USDI, Bureau of Land Management, Wyoming State Office."  To ensure consistency with EO 2015-4, modify the Stipulation as follows: "Prohibit or restrict surface-disturbing and/or disruptive activities within sage-grouse winter concentration areas (1) from December 1 to March 14; (2) as mapped in EO 2015-4 <del>on the W-land/Cody Field Office GIS database</del> ; (3) protecting mapped Greater sage-grouse winter habitats/concentration areas."
Appendix G, Management Action # 4119	G-21		In the Exception section, make the following modification: "An exception to the stated limits may be granted when onsite and/or offsite mitigation..."
Appendix G, Management Action # 4120	G-22		See my comments in Attachment 2 and 3 concerning Required Design Features.
Appendix L, Required Design Features and Best Management			

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Appendix Y, Mitigation	Y-15	<p>BLM states: "In undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation within PHMA, the BLM/USFS will require and assure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation." Wyoming strategy is mitigation. If a project conforms to the management prescriptions contained in EO 2015-4, no additional mitigation is required.</p> <p>To rectify this inconsistency, the BLM should add the following language: "in PHMAs that exceed the threshold of 5% disturbance and an average of 1 activity per 640 acres, the BLM will require and ensure mitigation that provides a net conservation gain to the species."</p>